

# **Exhibit 1**

All documents concerning any communications between You and any governmental agency concerning the Copyright Works.

**Request No. 12:**

Documents sufficient to demonstrate the first publication date of each of the Copyright Works.

**Request No. 13:**

Documents sufficient to demonstrate whether any of the Copyright Works were created as a work for hire.

**Request No. 14:**

All documents concerning whether any of the Copyright Works is a work for hire.

**Request No. 15:**

All documents evidencing, referring, or relating to the chain of title for the Copyright Works.

**Request No. 16:**

All documents concerning ownership of or claims of right in the Copyright Works.

**Request No. 17:**

All documents relating to Your allegation in paragraph 81 of Your complaint that “Plaintiffs own and/or control in whole or in part the copyrights and/or exclusive rights in ... the sound recordings listed on Exhibit A and musical compositions listed on Exhibit B.”

**Request No. 18:**

All documents concerning disputes related to ownership at any time of the Copyright Works, including documents between You and any person concerning any question, uncertainty,

litigation, or disputes over Your ownership, co-ownership, administration, control of, or other rights to, the Copyright Works.

**Request No. 19:**

Documents, including without limitation organizational charts, sufficient to identify Your organizational structure since January 1, 2013, including without limitation Your departments, divisions, corporate officers, executives, and managers, including their names, titles, direct reports, and duties and responsibilities.

**Request No. 20:**

Documents, including without limitation corporate organizational charts, sufficient to identify Your corporate family structure since January 1, 2013, including without limitation Your parents, subsidiaries, affiliates, successors, and predecessors.

**Request No. 21:**

All documents concerning all forms of assignments of the copyrights that You claim cover the Copyright Works for each of last ten (10) years.

**Request No. 22:**

All documents concerning all forms of licenses of the copyrights that You claim cover the Copyright Works and that were in effect at any time during the last ten (10) years.

**Request No. 23:**

All master agreements with entities to which You license the Copyright Works, such as, for example, the Apple Store, Google Play, Spotify, YouTube, Pandora, etc. and that were in effect at any time during the last ten (10) years.

**Request No. 24:**